

IN RE:	:	
MICHAEL EUGENE APPLER	:	CASE NO. 1-14-02287-MDF
aka MICHAEL E. APPLER	:	
Debtor	:	
	:	CHAPTER 13
MTGLQ INVESTORS, L.P. c/o	:	
SHELLPOINT MORTGAGE	:	
SERVICING	:	
Movant	:	
	:	
v.	:	
	:	
MICHAEL EUGENE APPLER	:	
aka MICHAEL E. APPLER	:	
Respondent	:	


**AND NOW**, comes Debtor, Michael Eugene Appler, by and through his attorney, Gary J.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part, denied in part. The Mortgage speaks for itself. Strict proof is required that the Movant is the holder of the mortgage.
6. Admitted in part, denied in part. The Assignment speaks for itself.
7. Admitted. Further, Debtor's attempts to obtain a loan modification were denied because his tax returns were not filed. Said tax returns are now filed. Debtor will reapply for a loan modification. In the interim, Debtor offers to pay the post-petition arrears through an Amended Plan.

8. Admitted in part, denied in part. See response to paragraph 7.
9. Admitted in part, denied in part. Debtor has no knowledge. Strict proof is demanded.
10. Admitted in part, denied in part. Said value was the value as of May 6, 2014. It is believed and hereby averred that the property has appreciated in value since said date.
11. Admitted in part, denied in part. Debtor has no knowledge as to the pay off. Debtor believes and hereby avers that there is some equity in the real estate.
12. Denied. There is some equity in the real estate. For further answer, see response to paragraph 7.
13. Admitted in part, denied in part. Debtor has no knowledge.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: 9/12/16

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF MTGLQ INVESTORS, L.P. C/O SHELLPOINT MORTGAGE SERVICING FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

DANIELLE BOYLE-EBERSOLE, ESQUIRE  
COUNSEL FOR MOVANT  
VIA E-SERVICE

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DATED: 9/12/2016